

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In re:	) CASE NO. 17-15475-jkf
	) JUDGE Jean K. FitzSimon
	)
Andrew P. Gaeta,	)
	)
Danielle Gaeta,	)
	)
Debtors.	)
	)
	)
	)

**NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING NOTICE OF  
DEBTOR’S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing (“Creditor”), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor’s request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/2020 through 06/01/2020. Creditor holds a secured interest in real property commonly known as 12478 BALSTON RD, PHILADELPHIA, PA 19154 as evidenced by claim number 3-1 on the Court’s claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 07/01/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid & Crane LLC  
Authorized Agent for Secured Creditor  
10700 Abbott’s Bridge Road, Suite 170  
Duluth, GA 30097  
Telephone: (470) 321-7112

By: /s/Erin Elam  
Erin Elam, Esquire  
Email: eelam@rascrane.com

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 6th day of May 2020.:

**Andrew P. Gaeta  
12478 Balston Road  
Philadelphia, PA 19154**

**Danielle Gaeta  
12478 Balston Road  
Philadelphia, PA 19154**

And via electronic mail to:

**PAUL H. YOUNG  
Young, Marr & Associates  
3554 Hulmeville Road  
Suite 102  
Bensalem, PA 19020**

**SCOTT F. WATERMAN (Chapter 13)  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606**

**United States Trustee  
Office of the U.S. Trustee  
200 Chestnut Street  
Suite 502  
Philadelphia, PA 19106**

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By: /s/Erin Elam  
Erin Elam, Esquire  
Email: eelam@rascrane.com